

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NICHOLAS OWOYEMI,	:
<i>Pro Se Plaintiff,</i>	: ECF
-against-	: Index No. 10 CV 6001(ERK) (JO)
J.P.MORGAN CHASE & CO. and CHASE	: DEFENDANTS' NOTICE OF
INVESTMENT SERVICES CORP.,	: MOTION TO DISMISS AND TO
	: COMPEL ARBITRATION
Defendants.	:

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PLEASE TAKE NOTICE that upon the Complaint, filed November 22, 2010 in the New York State Supreme Court, the removal papers filed by Defendants JPMorgan Chase Bank, N.A. and Chase Investment Services Corp., filed December 28, 2010, the declaration of Trese Cintron, executed January 4, 2011, the affidavit of Talee Zur (Potter), sworn to January 4 2011, the accompanying memorandum of law, and all the prior pleadings and proceedings heretofore had herein, Defendants JPMorgan Chase Bank, N.A. (erroneously named as JPMorgan Chase & Co. and Chase Investment Services Corp.) and Chase Investment Services Corp., by their attorney, JPMorgan Chase Legal & Compliance Department, Talee Zur (Potter), Assistant General Counsel, will move this Court before the Honorable Edward R. Korman, United States District Judge, at the United States Courthouse, Room 918, 225 Cadman Plaza, East Brooklyn, New York, 11722, for an order and judgment, dismissing the above-captioned action and compelling arbitration on pursuant to 9 U.S.C. § 3 FAA, and for such other relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, pursuant to the Order of the District Court dated _____, 2011, Plaintiff's answering affidavits and opposing memorandum must be served upon the undersigned Defendants' counsel on or before _____, 2011.

Dated: January 4, 2011

**JPMORGAN CHASE LEGAL AND
COMPLIANCE DEPARTMENT**

By: _____

Talee Zur (Potter)

Attorneys for Defendants

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